

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

JULIA HEAVERN, et al.

Plaintiffs,

v.

CAPITOL HOTEL COMPANY
(COURTYARD MARRIOTT),

Defendant.

CIVIL ACTION NO.: 05-11170-MEL

ASSENTED TO MOTION TO EXTEND DISCOVERY DEADLINES

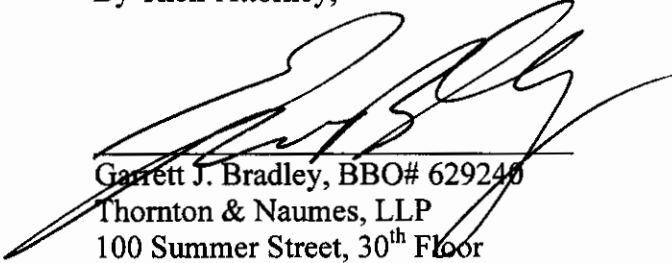
Now come the parties in this action and hereby move this Court for an order extending the time to complete deposition discovery in this action for an additional Sixty (60) days until June 1, 2006. The parties further request that the Court amend all subsequent deadlines to correspond with the amendment of the discovery deadline. In support of their motion, the parties state as follows:

1. This is a personal injury action wherein the Plaintiffs sustained injury while swimming in Defendant's pool.
2. Depositions in this case are scheduled to be completed by April 1, 2006, Expert Disclosures are scheduled to be completed from the Plaintiffs on June 1, 2006, and from the Defendants by June 30, 2006, and the Pre-Trial Conference is currently scheduled for August 15, 2006.
3. Both parties have completed written discovery, however, due to scheduling conflicts we have not been able to complete the necessary depositions in accordance with the stated deadlines.
4. The requested extension will afford the parties sufficient time to conclude their ongoing discovery activities, including the taking of remaining depositions.

5. The requested enlargement of time will not prejudice any party, nor require any substantial delay in this action.
6. Counsel for all parties have jointly agreed to this motion.
7. The foregoing constitute good cause for extension of the time within which to complete depositions until June 1, 2006.

WHEREFORE, the parties respectfully request that this Court extend the discovery deadlines for an additional Sixty (60) days until June 1, 2006, and to amend, all subsequent deadlines to correspond with the amendment of the discovery deadline.

Respectfully Submitted,
The Plaintiffs,
By Their Attorney,



Garrett J. Bradley, BBO# 629240
Thornton & Naumes, LLP
100 Summer Street, 30th Floor
Boston, MA 02110
(617) 720-1333

ASSENTED TO:

The Defendant,
By Their Attorneys,



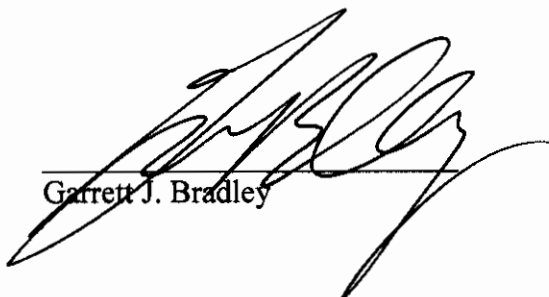
Anthony Campo, BBO#
Keith L. Sachs, BBO#
Attorney for Defendant Capitol Hotel Company
Boyle, Morrissey & Campo, P.C.
695 Atlantic Avenue
Boston, MA 02111

DATED: February 21, 2006

AFFIDAVIT OF SERVICE

I, Garrett J. Bradley, do hereby certify that on this 21st day of February, 2006, I served the above notice on the Defendants in the above-entitled action by mailing a copy thereof, postage prepaid, to counsel of record:

Anthony Campo, Esq.
Keith L. Sachs, Esq.
Boyle, Morrissey & Campo, P.C.
695 Atlantic Avenue
Boston, MA 02111



Garrett J. Bradley